

DISTRICT COURT OF MARYLAND FOR

LOCATED AT (COURT ADDRESS)



Prince Georges County
4990 Rhode Island Avenue
Hyattsville, Maryland 20781

CASE NO.

CV

PARTIES

Plaintiff

Larry McKenny Bullock
9401 Carol Street
Upper Marlboro, Maryland 20774

VS.

Defendant(s)

1. Midland Funding LLC
8875 Aero Drive, Suite 200
San Diego, California 92123

Serve by:

☐ Certified
Mail
☐ Private
Process
☐ Constable
☐ Sheriff

2. Serve on Resident Agent,
CSC - Lawyers Incorporating Service Company
7 St. Paul Street, Suite 1660
Baltimore, Maryland 21202

Serve by:

☒ Certified
Mail
☐ Private
Process
☐ Constable
☐ Sheriff

3.

Serve by:

☐ Certified
Mail
☐ Private
Process
☐ Constable
☐ Sheriff

4.

Serve by:

☐ Certified
Mail
☐ Private
Process
☐ Constable
☐ Sheriff

ATTORNEYS

For Plaintiff - Name, Address, Telephone Number & Code

COMPLAINT ☒ \$5,000 or under ☐ over \$5,000 ☐ over \$10,000Clerk: Please docket this case in an action of ☐ contract ☒ tort
☐ replevin ☐ detinue ☐ bad faith insurance claim

The particulars of this case are:

On June 6, 2012 I sent by certified mail a request for validation of the debt to defendant Midland Funding LLC. They failed to respond at all to this request. On July 11, 2012 I sent them a letter informing them that they were now in violation of the Fair Debt Collection Practices Act. Again no response. Defendant Midland Funding LLC is in violation of the Fair Credit Reporting Act's section 605(c) which covers the running of the reporting period. They are also in violation of the Fair Debt Collection Practices Act's section 809(b) which concerns the reporting of a debt that has not been validated to the credit bureaus. I am also suing for Defamation of Character and Financial Injury because Midland's actions and wanton disregard has harmed my credit standing and forced me to pay higher rates to receive credit.

(See Continuation Sheet)

☒ Legal☐ Contractual _____ %

The Plaintiff claims:

☒ \$ \$3,000 00 plus interest of \$ _____ and attorney's fees of \$ 0 plus court costs.☐ Return of the property and damages of \$ _____ for its detention in an action of replevin.☐ Return of the property, or its value, plus damages of \$ _____ for its detention in action of detinue.☐ Other: _____ and demands judgment for relief.

Signature of Plaintiff/Attorney/Attorney-Code

Signer's Address: 9401 Carol Street, Upper Marlboro, MD 20774

Signer's Telephone Number: 202-718-1214

Signer's Facsimile Number, if any: _____

Signer's E-mail Address, if any: _____

MILITARY SERVICE AFFIDAVIT

☐ Defendant(s) _____ is/are in the military service.
☒ No Defendant is in the military service. The facts supporting this statement are: A limited liability corporation cannot be in the military

Specific facts must be given for the Court to conclude that each Defendant who is a natural person is not in the military

☐ I am unable to determine whether or not any Defendant is in military service.

I hereby declare or affirm under the penalties of perjury that the facts and matters set forth in the foregoing Affidavit are true and correct to the best of my knowledge, information, and belief.

7/19/12
Date

Signature of Affiant

APPLICATION AND AFFIDAVIT IN SUPPORT OF JUDGMENT

Attached hereto are the indicated documents which contain sufficient detail as to liability and damage to apprise the Defendant clearly of the claim against the Defendant, including the amount of any interest claimed.

☐ Properly authenticated copy of any note, security agreement upon which claim is based ☐ Itemized statement of account ☐ Interest worksheet
☐ Vouchers ☐ Check ☐ Other written document ☐ Verified itemized repair bill or estimate

I HEREBY CERTIFY: That I am the ☒ Plaintiff ☐ _____ of the Plaintiff herein and am competent to testify to the matters stated in this complaint, which are made on my personal knowledge; that there is justly due and owing by the Defendant to the Plaintiff the sum set forth in the Complaint.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the above Complaint are true and I am competent to testify to these matters.

July 19, 2012
Date

Signature of Affiant